LAW OFFICES OF

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May 13, 2024

BY ECF

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall
U. S. Courthouse – 40 Foley Square
New York, New York 10007

Application denied at this time.

SO ORDERED:

WERNON'S PROPERTY 05/31/2024

HON, VERNON S. BRODERICK UNITED STATES DISTRICT JUDGE

Re:

United States v. Shakur Pinder

19 Crim. 0012 (VSB)

Dear Judge Broderick:

As you know, I represent Shakur Pinder, the defendant in the above matter who was sentenced by Your Honor to, *inter alia*, time served (no days in custody) and a four-year term of supervised release on November 13, 2020. I am writing to respectfully request that pursuant to 18 U.S.C. §3583(e), the Court terminate Mr. Pinder's term of supervised release six months early. Notably, Mr. Pinder's Probation Officer, Lisa Famularo, has advised me that Probation supports his application for early termination at this time as he satisfies the criteria found in § 380.10 of the U.S. Sentencing Commission's Guide to Judicial Policy.

Mr. Pinder, now 29 years old, was as the Court may recall one of the least culpable defendants in this matter. He has been compliant with the terms of his supervision, has satisfied the financial obligations of his sentence, including paying restitution in full, has had a stable and secure residence in Brooklyn and has been gainfully employed throughout the term of his supervision. During this time, Mr. Pinder has also become a father for the first time and looks forward to continuing, as he has over the last three and a half years, to lead a law abiding life and serving as a positive role model for his baby daughter. In short, Mr. Pinder has demonstrated the ability to lawfully self-manage his life without the need for further supervision. We submit that under these circumstances, terminating his supervision with just six months to go "is warranted by the conduct of the defendant and the interest of justice." 18 U.S.C. §3583(e).

I reached out to AUSA Daniel Nessim last week but have not heard back from him. I believe he may be on trial.

Thank you for your consideration of this matter.

Respectfully/yours

Frederick\L. Sosinsky

FLS: bms